

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

<b>UNITED STATES OF AMERICA</b>	:	<b>Criminal Number:</b>
	:	<b>Violations:</b>
	:	
v.	:	<b>18 U.S.C. § 666(a)(1)(A) (Theft Concerning Programs Receiving Federal Funds)</b>
	:	
	:	<b>26 U.S.C. § 7206(1) (Filing a False Return)</b>
	:	
<b>HARRY L. THOMAS, JR.,</b>	:	<b>18 U.S.C. § 981(a)(1)(C) and</b>
<b>Defendant.</b>	:	<b>28 U.S.C. § 2461(c) (Criminal Forfeiture)</b>
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**INFORMATION**

The United States of America charges that:

At all times material to this Information:

**COUNT ONE**  
**(Theft Concerning Programs Receiving Federal Funds)**

1. The District of Columbia was a State, as defined by Title 18, United States Code, Section 666(d)(4), that received federal assistance in excess of \$10,000 during each calendar year in 2007, 2008 and 2009.

2. Defendant HARRY L. THOMAS, JR. was an agent of the District of Columbia, whose duties as an elected member of the District of Columbia Council included voting on matters before the Council, including voting on the District of Columbia's annual budget and legislation concerning the distribution of public funds, among other things.

3. From at least as early as in or about April 2007 and continuing until at least in or about February 2009, in the District of Columbia, defendant HARRY L. THOMAS, JR. embezzled,

stole, obtained by fraud, without authority knowingly converted to the use of a person not the rightful owner, and intentionally misapplied property worth at least \$5,000 and owned by, under the care of, under the custody of, and under the control of the District of Columbia, that is, \$353,500 in District of Columbia funds.

**(Theft Concerning Programs Receiving Federal Funds,  
in Violation of Title 18, United States Code, Section 666(a)(1)(A))**

**COUNT TWO  
(Filing a False Tax Return)**

4. From on or about October 10, 2008 through on or about May 12, 2011, in the District of Columbia, defendant HARRY L. THOMAS, JR., a resident of the District of Columbia, did willfully make and subscribe to U.S. Individual Income Tax Returns for the calendar years 2007, 2008 and 2009, which were verified by a written declaration that they were made under penalties of perjury and which he did not believe to be true and correct as to every material matter. The income tax returns that were filed with the Internal Revenue Service reported that the total income for defendant HARRY L. THOMAS, JR. was \$108,593 for 2007, \$115,133 for 2008, and \$120,099 for 2009, and that he had no other income which was not described in the returns, when in truth and in fact, as he then and there well knew and believed, his total income was greater than the amounts reported, in that during the years 2007, 2008 and 2009 he had received the following amounts of additional unreported income: \$25,000 in 2007, \$278,000 in 2008, and \$43,000 in 2009.

**(Filing a False Return, in Violation of  
Title 26, United States Code, Section 7206(1))**

**FORFEITURE ALLEGATION**

1. The violation alleged in Count One of this Information is realleged and incorporated by reference herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. As a result of the offense alleged in Count One of this Information, defendant HARRY L. THOMAS, JR. shall forfeit to the United States the following personal property:

- (a) a 2008 Victory Motorcycle, VIN: 5VPBC26D483001346, last registered to HARRY L. THOMAS, JR.; and
- (b) a 2008 Chevrolet Tahoe LTZ, VIN: 1GNFK130X8J116941, registered to HARRY L. THOMAS, JR.

as property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly, as the result of the offense alleged in Count One.

3. By virtue of the commission of the felony offense charged in Count One of this Information, any and all interest that defendant HARRY L. THOMAS, JR. has in this property constituting, or derived from, proceeds obtained directly or indirectly, as the result of such offense is vested in the United States and hereby forfeited to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

**(Criminal Forfeiture, in violation of Title 18, United States Code,  
Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c))**

RONALD C. MACHEN JR.  
UNITED STATES ATTORNEY

By: 

Jonathan W. Haray, D.C. Bar 480140  
Courtney G. Saleski, D.C. Bar 496744  
Bridget M. Fitzpatrick, D.C. Bar 474946  
Assistant United States Attorneys  
United States Attorney's Office  
for the District of Columbia  
Fraud and Public Corruption Section  
555 Fourth Street, NW  
Washington, DC 20530  
Email: [jonathan.haray@usdoj.gov](mailto:jonathan.haray@usdoj.gov)  
[courtney.saleski@usdoj.gov](mailto:courtney.saleski@usdoj.gov)  
[bridget.fitzpatrick@usdoj.gov](mailto:bridget.fitzpatrick@usdoj.gov)

JACK SMITH  
Chief, Public Integrity Section

By: 

Peter Mason, D.C. Bar 987804  
Trial Attorney  
Public Integrity Section  
Criminal Division  
United States Department of Justice  
1400 New York Avenue, NW, Suite 12100  
Washington, DC 20005  
Email: [peter.mason@usdoj.gov](mailto:peter.mason@usdoj.gov)